



Cincinnati BellSM

***UNE Performance
Measurements and Standards***

CC Docket No. 01-318

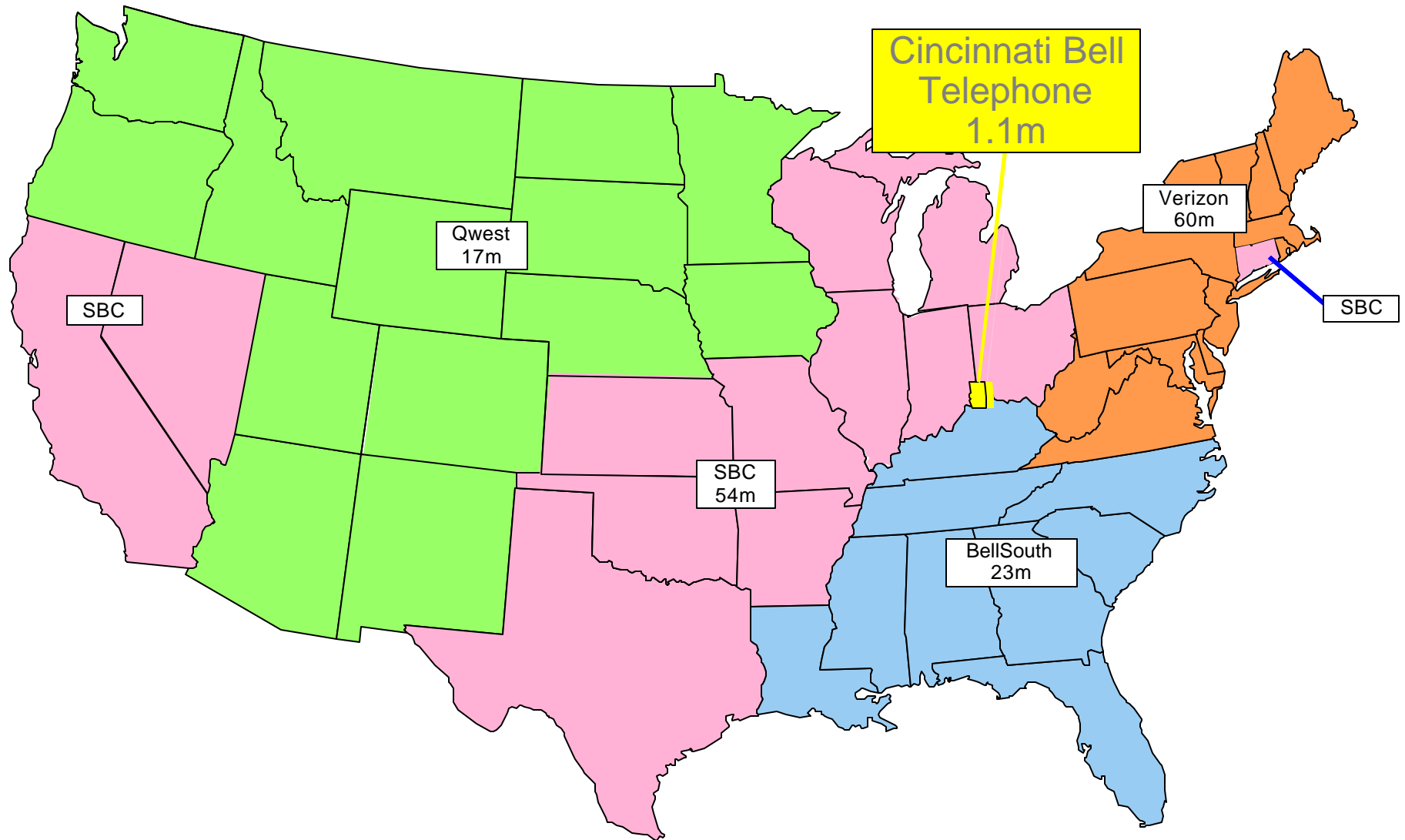
October 22, 2002

Who we are...

- **Cincinnati Bell Telephone operates in southwestern Ohio, northern Kentucky, and southeastern Indiana (1 LATA, 1 MSA)**
- **1.1 million access lines**
 - 870,000 in Ohio
 - 230,000 in Kentucky
 - 70% Residential
 - 30% Business
- **3,000 employees**
- **\$830 million in revenue**



RBOC and CBT Territories and Lines



October 22, 2002

Competitive Activity

- 67 Interconnection agreements
 - 38 in Ohio
 - 24 in Kentucky
 - 5 in Indiana
- 17 CLECs currently operating
 - 11 Full service
 - 6 Resale only
- 11 Collocators

CBT's Experience

- Currently 4 CLECs purchase UNEs from CBT
- CBT processes less than 20 UNEs per month
- On average CBT has 600 UNEs in service
- CLECs currently place all orders manually
- CLEC orders are processed via the same systems as CBT's orders, thereby ensuring non-discriminatory treatment

One Size Does Not Fit All

- CBT...
 - Is not subject to multiple measurements and reporting requirements in multiple states
 - Does not have an entire staff available to track and measure performance
 - Does not have many requests from CLECs for UNEs
 - Has not been the subject of complaints by CLECs
 - Application of national measurements and reporting will increase costs for CBT

Exempt Mid-size ILECs from National Measurements

- Section 251 requirement to provide just, reasonable, and nondiscriminatory access would still apply
- The only appropriate standard is “parity” with what the ILEC provides to itself
- Allow interconnection negotiations to determine measurements and reporting
- The states are in the best position to resolve any charges of non-compliance and tailor appropriate remedies for mid-size ILECs